



Department of Environmental Protection

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Colleen M. Castille
Secretary

P.E. CERTIFICATION STATEMENT

PERMITTEE

Fero Funeral Home

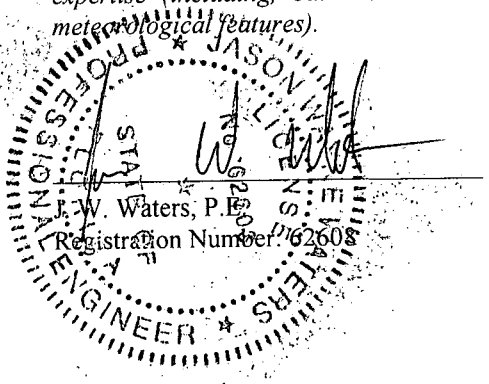
Draft Air Permit No. 0830080-004-AC

Permit Modification: Human Crematory,
Increase Temperature

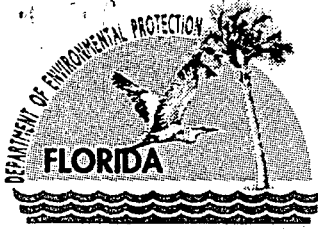
PROJECT DESCRIPTION

This is an construction permit to increase the operation temperature of an IE43-PPII (Power Pack II) Human Crematory. The emissions are controlled by a thermal oxidizer.

I HEREBY CERTIFY that the air pollution control engineering features described in the above referenced application and subject to the proposed permit conditions provide reasonable assurance of compliance with applicable provisions of Chapter 403, Florida Statutes, and Florida Administrative Code Chapters 62-4 and 62-204 through 62-297. However, I have not evaluated and I do not certify aspects of the proposal outside of my area of expertise (including, but not limited to, the electrical, mechanical, structural, hydrological, geological, and meteorological features).



10/7/2005
(Date)



Department of Environmental Protection

*Permit File
Copy*

Jeb Bush
Governor

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Colleen M. Castille
Secretary

CERTIFIED MAIL

In the Matter of an Application
for Permit by:

DEP File No.: 0830080-004-AC
County: Marion

Mr. William C. Ward, III, General Manager
Fero Funeral Home
SCI Funeral Services of Florida
7620 South U.S. Highway 41
Dunnellon, Florida 34432

INTENT TO ISSUE PERMIT

The Department of Environmental Protection gives notice of its intent to issue a permit (copy attached) for the proposed project as detailed in the application specified above, for the reasons stated below.

The applicant applied on September 27, 2005, to the Department of Environmental Protection for the construction modification of a crematory unit to allow it to operate at an increased operating temperature.

The Department has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.). The project is not exempt from permitting procedures. The Department has determined that a construction permit (AC) is required for the proposed work.

The Department intends to issue this permit based on the belief reasonable assurances have been provided to indicate the proposed project will comply with the appropriate provisions of Florida Administrative Code (F.A.C.) Chapters 62-204 through 62-297 & 62-4.

Pursuant to Section 403.815, F.S., you (the applicant) are required to publish at your own expense the enclosed Notice of Intent to Issue Permit. The notice will be published one time only within 30 days of receipt of this Intent to Issue, in the legal ad section of a newspaper of general circulation in the area affected. For the purposes of this rule "publication in a newspaper of general circulation in the affected area" means publication in a newspaper meeting the requirements of Sections 50.011 and 50.031, F.S., in the county where the activity is to take place. Where there is more than one newspaper of general circulation in the county, the newspaper used must be one with significant circulation in the area that may be affected by the permit. If you are uncertain that a newspaper meets these requirements, please contact the Department at the address or telephone number listed above. The applicant shall provide proof of publication to the Department, at 3804 Coconut

Palm Drive, Tampa Florida 33619 within 7 days of publication. Failure to publish the notice and provide proof of publication within the allotted time may result in the denial of the permit.

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within 14 days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within 14 days of publication of the public notice or within 14 days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within 14 days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the agency action or proposed action;
- (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
- (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's action; and
- (f) A statement of specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and
- (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice of intent. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

In addition to the above, a person subject to regulation has a right to apply for a variance from or waiver of the requirements of particular rules, on certain conditions, under Section 120.542, F.S. The relief provided by this state statute applies only to state rules, not statutes, and not to any federal regulatory requirements. Applying for a variance or waiver does not substitute or extend the time for filing a petition for an administrative hearing or exercising any other right that a person may have in relation to the action proposed in this notice of intent.

The application for a variance or waiver is made by filing a petition with the Office of General Counsel of the Department, 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida 32399-3000. The petition must specify the following information:

- (a) The name, address, and telephone number of the petitioner;
- (b) The name, address, and telephone number of the attorney or qualified representative of the petitioner, if any;
- (c) Each rule or portion of a rule from which a variance or waiver is requested;
- (d) The citation to the statute underlying (implemented by) the rule identified in (c) above;
- (e) The type of action requested;
- (f) The specific facts that would justify a variance or waiver for the petitioner;
- (g) The reason why the variance or waiver would serve the purposes of the underlying statute (implemented by the rule); and
- (h) A statement whether the variance or waiver is permanent or temporary and, if temporary, a statement of the dates showing the duration of the variance or waiver requested.

The Department will grant a variance or waiver when the petition demonstrates both that the application of the rule would create a substantial hardship or violate principles of fairness, as each of those terms is defined in Section 120.542(2), F.S., and that the purpose of the underlying statute will be or has been achieved by other means by the petitioner.

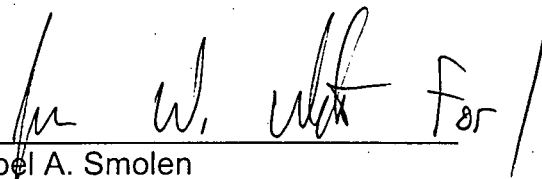
Persons subject to regulation pursuant to any federally delegated or approved air program should be aware that Florida is specifically not authorized to issue variances or waivers from any requirements of any such federally delegated or approved program. The requirements of the program remain fully enforceable by the Administrator of EPA and by

the person under the Clean Air Act unless and until Administrator separately approves any variance or waiver in accordance with the procedures of the federal program.

Any person listed below may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, and all other materials available to the Department that are relevant to the permit decision. In addition any person may send written comments on the proposed permitting action. All requests and comments should be sent to this office at the address referenced above to the attention of Mr. Jason Waters, P.E. (phone no. 813-744-6100 ext. 107) referencing Permit File No. 0830080-004-AC. All comments received within 14 days of receipt of this Intent to Issue will be considered in the Department's final determination.

Executed in Tampa, Florida.

STATE OF FLORIDA DEPARTMENT
OF ENVIRONMENTAL PROTECTION



Joel A. Smolen
Acting District Air Program Administrator

Attachment

Copies to:

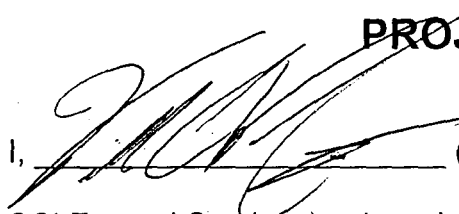
Mr. Ramanathan Iyer, P.E.
Southern Environmental Sciences, Incorporated
1204 North Wheeler Street
Plant City, Florida 33563




Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, FL 33619

PROOF OF RECEIPT OF INTENT TO ISSUE DOCUMENTS FOR PROJECT NO. 0830080-004-AC

I,  (William C. Ward, III, General Manager, Fero Funeral Home – SCI Funeral Services) acknowledge to have received and be in possession of the Intent to Issue documents (including DRAFT permit) pertaining to FDEP Project No. 0830080-004-AC. Such documents were hand delivered to me by authorized Department personnel on October 7, 2005.

Authorized Department Representative:

 W. W. W. 10/7/05

 10/7/05

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

Printed on recycled paper.

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NOTICE OF INTENT TO ISSUE PERMIT

The Department of Environmental Protection gives notice of its intent to issue an air pollution permit to Fero Funeral Home – SCI Funeral Services of Florida for the construction modification of a human crematory unit at its Dunnellon location. Permit No. 0830080-004-AC will allow the existing crematory unit to operate at an increased operating temperature in accordance with existing state regulations. The facility's emissions will continue to be below all threshold levels that would cause it to be defined as a major source of emissions under Title V provisions of the Clean Air Act. (MAILING ADDRESS – Fero Funeral Home, SCI Funeral Services of Florida 7620 South U.S. Highway 41, Dunnellon, FL 34432 to the attention of Mr. William C. Ward, III, General Manager).

The Department will issue the permit with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to Sections 120.569 and 120.57, F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under Sections 120.569 and 120.57, F.S. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station 35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under Section 120.60(3), F.S., must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under Section 120.60(3), F.S., however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under Sections 120.569 and 120.57, F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205, F.A.C.

A petition that disputes the material facts on which the Department's action is based must contain the following information:

- (a) The name and address of each agency affected and each agency's file or identification number, if known;
- (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an

- explanation of how the petitioner's substantial interests will be affected by the agency determination;
- (c) A statement of how and when petitioner received notice of the agency action or proposed action;
 - (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate;
 - (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's action; and
 - (f) A statement of specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and
 - (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

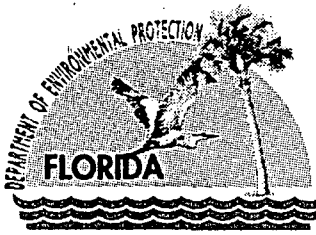
A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by Rule 28-106.301, F.A.C.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this permit. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

Mediation is not available in this proceeding.

The application is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at 8407 Laurel Fair Circle, Tampa, Florida.

Any person may request to obtain additional information, a copy of the application (except for information entitled to confidential treatment pursuant to Section 403.111, F.S.), all relevant supporting materials, a copy of the permit draft, and all other materials available to the Department that are relevant to the permit decision. Additionally, the Department will accept written comments concerning the proposed permit issuance action for a period of 14 (fourteen) days from the date of publication of "Public Notice of Intent to Issue Permit." Requests and written comments filed should be provided to the Florida Department of Environmental Protection at 3804 Coconut Palm Drive, Tampa, FL 33619 to the attention of Mr. Jason Waters, P.E. (phone no. 813-744-6100 ext. 107) referencing Permit File No. 0830080-004-AC. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed permit and require, if applicable, another Public Notice.



Jeb Bush
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Department of Environmental Protection

Southwest District
3804 Coconut Palm Drive
Tampa, Florida 33619

Colleen M. Castille
Secretary

Permittee:

Fero Funeral Home
SCI Funeral Services of Florida
7620 U.S. Highway 41
Dunnellon, Florida 34432

Effective Date:

DRAFT Permit No: 0830080-004-AC
County: Marion
Expiration Date: 10/06/2006
Project: Increase Incineration
Temperature

Permitting Authority

This permit is issued under the provisions of Chapter 403, Florida Statutes (F.S.) and Florida Administrative Code (F.A.C.) Chapters 62-4, 62-204, 62-210, 62-212, 62-213, 62-296, and 62-297. The permittee (listed above) is hereby authorized to perform the work or operate the facility shown on the application and approved drawing(s), plans, and other documents, attached hereto or on file with the Department and made a part hereof and specifically described as follows:

Facility Information Summary

Permit No. 0830080-004-AC authorizes a minor modification that allows for an increase in afterburner operating temperature of a cremation unit constructed prior to August 30, 1989. After receipt of this permit and completion of all requirements herein, the facility intends to submit a completed Human Crematory Air General Permit Notification form.

The unit is a Mathews Model IE43-PP11 human cremation incinerator. This unit is designed to incinerate human remains and any associated container materials at an average rate of 150 pounds per hour (the average rate is the total weight loaded into the unit divided by the duration of the burn). The incinerator consists of primary and secondary (afterburner) chambers that may be fired on either natural gas or LP gas with a maximum total heat input rate of 1.9 MMBtu/hour (1.2 MMBtu/hour primary chamber and 0.7 MMBtu/hour secondary chamber).

Emissions are controlled by the afterburner, which maintains a minimum secondary chamber combustion zone temperature of 1,600°F prior to and during combustion of material in the primary chamber. The secondary chamber volume is designed to provide at least a one (1) second residence time at a gas temperature of 1,800°F. The secondary chamber temperature is continuously monitored and recorded.

PERMITTEE
Fero Funeral Home
SCI Funeral Services of Florida

DRAFT Permit No.: 0830080-004-AC
Project: Increase Incineration Temp.

PERMITTED SOURCES:

Emission Unit ID No.	Description
001	Crematory Incineration Unit

Note: Please reference Permit No. and appropriate Emissions Unit ID No. in all correspondence, test reports, applications, etc.

Location: 7620 South U.S. Highway 41, Dunnellon, Marion County

Facility ID No.: 0830080 **Site Name:** Dunnellon Crematory

UTM Coordinates: Zone 17, 359.0 km East and 3221.1 km North

Latitude: 29° 06' 38" **Longitude:** 82° 27' 00"

Permit History: Permit 0830080-002-AG expires on 10/28/2005. This construction permit modifies the above listed emission unit; thus, the applicant intends to submit a completed Human Crematory Air General Permit Notification form for the continued operation of the emission unit upon completion of all requirements described herein.

SPECIFIC CONDITIONS

1. General Conditions. The attached 14 General Conditions are part of this permit.

[Rule 62-4.160, F.A.C.]

2. Other Conditions. Issuance of this permit does not relieve the permittee from complying with the applicable emission limiting standards or other requirements of Chapters 62-200 through 297 F.A.C., or any other requirement under federal, state, or local law.

[Rule 62-210.300, F.A.C.]

Emission and Operation Limitations

3. Operating Hours. This crematory incinerator is permitted for continuous operation (i.e. 8,760 hours/year).

[Rule 62-210.200 (defn. "Potential to Emit"), F.A.C.]

PERMITTEE
Fero Funeral Home
SCI Funeral Services of Florida

DRAFT Permit No.: 0830080-004-AC
Project: Increase Incineration Temp.

4. Incinerated Materials. The crematory incinerator shall be operated as a batch incineration unit. Each separate batch process cycle shall be uninterrupted, and shall consist exclusively of the remains of one (1) human body and the associated container material.¹ The body may be clothed. The associated container material may contain up to 0.5% by weight-chlorinated plastics as demonstrated by the manufacturer's data sheet. No other material, including biological waste as defined in Rule 62-210.200 F.A.C. (see definition at end of permit) shall be incinerated.

Note1 – For human bodies that weigh over the manufacturers design capacity, the permittee shall contact the manufacturer for special operating instructions.

[Rule 62-296.401(5)(e.), F.A.C.]

5. Permitted Fuel. Firing of this crematory incinerator is permitted for natural gas and/or LP gas.

[Rule 62-210.200 (defn. "Potential to emit"), F.A.C.]

6. Visible Emissions. Visible emissions (VE) from this crematory incinerator shall not exceed 5% opacity except that visible emissions not exceeding 20% opacity are allowed for up to three minutes in any one-hour period.

[Rule 62-296.401(1)(a), F.A.C.]

7. General Pollutant Emission Limiting Standards: Objectionable Odor Prohibited. No person shall cause, suffer, allow or permit the discharge of air pollutants, which cause or contribute to an objectionable odor. An objectionable odor is any odor present in the outdoor atmosphere, which by itself or in combination with other odors, is or may be harmful or injurious to human health or welfare, which unreasonably interferes with the comfortable use and enjoyment of life or property, or which creates a nuisance.

[Rules 62-210.200 (defn. "Objectionable Odor") and 62-296.401(1)(b), F.A.C.]

8. Particulate matter (PM). PM emissions shall not exceed 0.080 grains per dry standard cubic foot of flue gas, corrected to 7% O₂.

[Rule 62-296.401(5)(a), F.A.C.]

9. Carbon monoxide (CO). CO emissions shall not exceed 100 parts per million by volume, dry basis, corrected to 7% O₂ on an hourly average basis.

[Rule 62-296.401(5)(b), F.A.C.]

PERMITTEE

Fero Funeral Home
SCI Funeral Services of Florida

DRAFT Permit No.: 0830080-004-AC

Project: Increase Incineration Temp.

10. Afterburner Operating Temperature. The secondary chamber (afterburner) combustion zone shall be maintained at a temperature of no less than 1,600°F throughout the combustion process in the primary chamber. Cremation in the primary chamber shall not begin unless the secondary chamber (afterburner) combustion zone temperature is equal to or greater than 1,600°F.

[Rule 62-296.401(5)(c), F.A.C.]

11. Circumvention. The permittee shall not allow any person to circumvent the afterburner. The afterburner and the temperature monitoring equipment shall be operational and functioning properly prior to the incineration or ignition of the human remains, and until all the remains are incinerated.

[Rules 62-210.650, and 62-296.401(5)(c) & (k), F.A.C.]

Operator Training Requirements

12. Operator Requirements. This crematory incinerator shall not be operated unless done so by an operator who has satisfactorily completed the required Department approved training.

[Rule 62-296.401(5)(f), F.A.C.]

13. Operator Training. All crematory operators must be trained by the equipment manufacturer's representatives or other qualified and approved organization. The training shall provide a basic understanding of the principles of combustion process, provide instruction on the operation and maintenance of the crematory unit, and increase awareness of regulatory requirements and safety concerns. Training programs shall consist of a minimum of 8 hours of instruction. They shall include, at a minimum, hands-on experience involving start-up, operation of at least one cremation, shutdown of equipment, and one full cycle of preventative maintenance procedures. All training must be conducted in accordance with the manufacturer's training program approved for this facility.

[Rule 62-296.401(5)(f)(1), (2), F.A.C.]

14. Operator Training Certificates. A copy of a certificate for each operator having satisfactorily completed the Department approved training program must be submitted to the Air Compliance Section of the Southwest District Office of the Department within 15 days of completion of training. An operator's certificate must be kept on file at the facility for the duration of the operator's employment and for an additional two years after termination of employment.

[Rule 62-296.401(5)(f)(2) & (3), F.A.C.]

Testing and Compliance Documentation Requirements

15. Visible Emissions (VE) Testing.

- A. In order to document compliance with the visible emissions (VE) limitation of Specific Condition No. 6 and to qualify for a subsequent air general permit (See *specific condition No. 26*), the crematory incinerator exhaust stack shall be tested as follows:
1. A VE test shall be conducted during the 60-day period prior to the submittal of the air general permit notification form. (See *Part II, item (4)(k)1 of the Human Crematory Air General Permit Notification Form*) and no later than 60 days after initial commercial operation of this unit at the higher afterburner temperature range specified in this permit (1600°F – 1800°F).
- B. The visible emissions test shall be conducted in accordance with DEP Method 9 by a certified observer and be a minimum of sixty (60) minutes in duration. The test observation period shall include the period during which the highest opacity emissions can reasonably be expected to occur. This means that the observation period shall begin with the commencement of combustion in the primary chamber.
- C. A copy of the test data shall be submitted to the Air Compliance Section of the Southwest District Office of the Department, within 45 days of such testing [and in conjunction with an application for an air general permit (see *Specific Condition No. 26*)]. The test report and related correspondence shall reference facility/emission unit identification number (i.e. 0830080/EU 001). The minimum requirements for stack sampling facilities, source sampling and reporting, shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

[Rules 62-296.401(1)(c) and (5)(g) and (i), 62-297.310(4)(a)2., and 62-297.310(8), F.A.C.]

PERMITTEE
Fero Funeral Home
SCI Funeral Services of Florida

DRAFT Permit No.: 0830080-004-AC
Project: Increase Incineration Temp.

16. Particulate and Carbon Monoxide Testing.

A. Prior to applying for an Air General Permit, the permittee shall demonstrate compliance with the particulate matter (PM) and carbon monoxide (CO) emission limitations contained in Specific Condition Nos. 8 and 9 by either:

1. Stack testing this unit for PM and CO emissions²; or
2. Submitting [in conjunction with an application for general permit [see *Specific Condition 26*]] a complete test report from an identical [see *definitions at end of permit*] human crematory unit tested in Florida within the last 5 years and approved by the Department that demonstrated compliance with the above particulate matter and carbon monoxide emission limitations.

Note 2 - If option 1 is chosen, copies of the test data shall be submitted to the Air Compliance Section of the Southwest District Office of the Department within 45 days of such testing, in conjunction with an application for an Air General Permit [see Condition No. 26].

B. Test Methods: The following EPA test methods, contained in 40 CFR 60, Appendix A and adopted by reference in Rule 62-297.401, F.A.C., shall be used for compliance testing:

1. EPA Method 1 – Sample and Velocity Traverse.
2. EPA Method 2 – Determination of Stack Gas Velocity / Volumetric Flow Rate.
3. EPA Method 3 – Gas Analysis for Oxygen.
4. EPA Method 5 – Determination of Particulate Matter Emissions.
5. EPA Method 10 – Determination of Carbon Monoxide Emissions.

The minimum requirements for stationary point source emissions test procedures and reporting shall be in accordance with Rule 62-297, F.A.C. and 40 CFR 60, Appendix A.

[Rules 62-296.401(5)(g)(i), and (j), 62-297.401, F.A.C.]

17. Operating Conditions During Testing. The crematory incinerator shall be tested in its normal operating mode. Emission testing shall be conducted during cremation of a batch (human remains + associated container and clothing) consisting of an adult sized, or adult-oversized human body with a minimum estimated weight of 150 pounds. The testing period shall begin with the commencement of combustion (cremation) in the primary chamber.

[Rules 62-4.070(3), 296.401(5)(h), and 62-297.310(2), F.A.C.]

PERMITTEE

Fero Funeral Home
SCI Funeral Services of Florida

DRAFT Permit No.: 0830080-004-AC

Project: Increase Incineration Temp.

18. Test Report. A compliance test report shall contain sufficient detail on the source tested and the test procedures used to allow the Department to determine if the test was properly conducted and the test results properly computed. At a minimum the test report shall provide the applicable information listed in Rule 62-297.310(8)(c), F.A.C. Included with the report shall be a copy of the daily operations log (see Condition No. 24) and the secondary chamber temperature monitor chart for the day(s) of the test. The start and end times of the cremation cycles and test periods, and the chart temperature scale shall be clearly indicated on the temperature chart. Failure to submit any of the above information or operating at conditions during the testing which are not representative of normal operating conditions may invalidate the test.

[Rules 62-4.070(3), and 62-297.310(8)]

19. Testing Notification. The permittee shall notify the Air Compliance Section of the Southwest District Office of the Department at least 15 days prior to the date on which each compliance test is to begin of the date and time of each such test, and the contact person who will be responsible for coordinating and having the test conducted.

[Rule 62-297.310(7)(a)9, F.A.C.]

Monitoring Requirements

20. Temperature Monitor. The permittee shall operate and maintain, in accordance with the manufacturer's instructions, a temperature monitoring system to continuously measure and record the secondary chamber combustion zone temperature at or beyond a point where a 1.0 second gas residence time would be achieved in the secondary chamber for a gas temperature of 1,800°F.

[Rules 62-296.401(5)(c) and (k), F.A.C.]

21. Calibration. Temperature sensors and recorders shall be calibrated and adjusted to indicate the true value of the temperature being measured with sufficient accuracy to allow the temperature to be determined within 10% of its true value.

[Rule 62-297.310(5)(b), F.A.C.]

22. Temperature Monitor Chart. The continuous temperature chart shall include, at a minimum, the following documentation:

- A. Date and time markings.
- B. Temperature scale markings.
- C. Operator name.
- D. Operator indication of when the primary chamber was charged and when combustion of material in primary chamber ceased.

Temperature charts shall be retained for at least a two-year period and made available to the Department upon request. [Rule 62-296.401(5)(k), F.A.C.]

PERMITTEE
Fero Funeral Home
SCI Funeral Services of Florida

DRAFT Permit No.: 0830080-004-AC
Project: Increase Incineration Temp.

23. Temperature Monitor QA Records. The permittee shall maintain a complete file of all continuous temperature monitor quality assurance related actions, including:

- A. Temperature monitoring device performance measurements.
- B. All continuous monitoring system performance evaluations.
- C. All continuous monitoring device calibration checks.
- D. Adjustments and maintenance performed on these systems.

and all other information required, recorded in a permanent legible format suitable for inspection. The file shall be retained for at least two years following the date of such measurements, checks or maintenance and made available to the Department upon request.

[Rule 62-296.401(5)(k), F.A.C.]

Additional Recordkeeping Requirements

24. Operation Log. In order to document compliance with Specific Condition Nos. 4, 11, 12 and 20, a daily crematory incinerator operating log showing the following shall be kept by the operator:

- A. Date, and name of the operator.
- B. Description of material incinerated.
- C. Size (child-sized, adult-sized, adult-oversized) and estimated weight of body and container placed in the primary chamber, along with any special procedures used (for oversize bodies above manufacturer's design capacity).
- D. Start and Stop Time of each cremation.
- E. Any maintenance performed on the cremation unit - indicate when, what, why, and by whom it was performed.

The above records shall be retained for the most recent three-year period and made available to the Department upon request. A copy of the daily log for the day of the test shall be submitted along with each test report.

[Rule 62-4.070(3), F.A.C.]

25. Containers. If containers are incinerated, the documentation from the manufacturers certifying that they are composed of 0.5% or less by weight chlorinated plastics must be kept on-file at the site for the duration of use and at least three years after use, and the documentation must also be submitted with any permit renewal applications.

[Rule 62-296.401(5)(e), 62-4.070(3), 62-4.160(14)(b), F.A.C.]

PERMITTEE
Fero Funeral Home
SCI Funeral Services of Florida

DRAFT Permit No.: 0830080-004-AC
Project: Increase Incineration Temp.

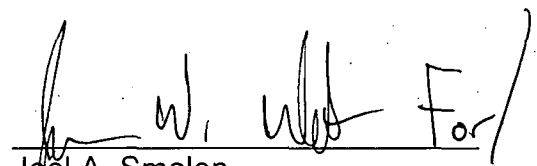
Air General Permit Notification Form

26. General Permit Application Requirements. Within 60 days of compliance testing, but no later than 90 days prior to the expiration date of this permit, the permittee shall submit the following to the Air Program of the Southwest District Office of the Department:

- A. Notification form (DEP Form 62-210.920(8), F.A.C. Human Crematory Air General Permit Notification Form for an air general permit (Rule 62-210.300(c)3., F.A.C., *Air General Permit - Human Crematory*) along with the appropriate fee (currently \$100 once every 5 years). (*Note: The Department encourages this option as the most efficient and economical for all parties*).
- B. A copy of the VE compliance test report as required by Specific Condition No. 15.
- C. Copies of a Particulate Matter and Carbon Monoxide identical unit test report or in the alternative, test results for the unit covered by this permit (see *condition No. 16*).
- D. Copies of the daily operating logs, as required by Specific Condition No. 24, for the most recent fifteen (15) days of operation.
- E. Copies of the operator training certificates as required by Specific Condition No. 14.

[Rules 62-4.050, 62-4.070(3), 62-210.300(2)&(4), 62-4.220, 62-296.401(5)(i), and 62-297.310(7)(a)1., and 62-297-310(8), F.A.C.]

FLORIDA DEPARTMENT OF
ENVIRONMENTAL PROTECTION



Joel A. Smolen
Acting District Air Program Administrator
Southwest District

DEFINITIONS

Biological Waste (Referenced in Specific Condition No. 4)

Solid Waste that causes or has the capability of causing disease or infection and includes, but is not limited to, biohazardous waste, diseased or dead animals, and other wastes capable of transmitting pathogens to humans or animals.

[Rule 62-210.200, F.A.C.]

Biohazardous Waste (Referenced in the above definition)

Any solid waste or liquid waste which may present a threat of infection to humans. The term includes, but is not limited to, nonliquid human tissue and body parts; laboratory and veterinary waste which contain human-disease causing agents; discarded sharps; human blood, human blood products and body fluids. The following are also included:

- A. Used absorbent materials saturated with blood products, body fluids, or excretions or secretions contaminated with visible blood; and absorbent materials saturated with blood or blood products that have dried;
- B. Nonabsorbent, disposable devices that have been contaminated with blood, body fluids, or secretions or excretions visibly contaminated with blood, but have not been treated by a method listed in Section 381.0098, F.S., or a method approved pursuant to Rule 64E-16, F.A.C.

[Rule 62-210.200, F.A.C.]

Identical Unit* (Referenced in Specific Condition No. 16)

For the combustion processes in the incinerators to be considered identical, the following design and operating parameters for the unit being permitted and for the tested unit (the unit that was tested in the submitted Identical Unit Test Report) will be reviewed by the DEP;

- A. Manufacturer and model number.
- B. Operating mode (i.e. batch) and rate.
- C. Primary and secondary burner locations, and heat input rates.
- D. Primary chamber volume.
- E. Secondary (afterburner) chamber volume and gas path.
- F. Both the Tested Unit and the Identical Unit should be operated at the tested unit's primary and secondary chamber test temperature (+100 degrees F, without the secondary chamber going below the minimum temperature allowed).
- G. Secondary (afterburner) chamber operating temperature (the secondary chamber temperatures recorded during the stack sampling period for the tested unit must be at least 1600°F).
- H. Exhaust gas flow rate (dscfm).
- I. Fuel Type. (This may be necessary to review if tested CO concentration is near limit. If the tested unit burned natural gas and the untested unit burns propane, the CO limit may be exceeded).

PERMITTEE

Fero Funeral Home
SCI Funeral Services of Florida

DRAFT Permit No.: 0830080-004-AC

Project: Increase Incineration Temp.

** If the cremator manufacturer will sign (or a Professional Engineer registered in Florida will sign, date, and seal) a statement saying that the two (2) units have the identical parameters as listed above, and will not exceed the permitted limits of regulated pollutants, and an air permitting P.E. from this Office agrees, the model numbers do not have to match verbatim for the units to be considered identical.*

[Department Guidance Memorandum – DARM-PER-01, dated 3/1/2000.]

TECHNICAL EVALUATION
AND
PRELIMINARY DETERMINATION
FOR

Fero Funeral Home
SCI Funeral Services of Florida
Dunnellon Crematory

Dunnellon

Marion County

Construction Permit Application Number

0830080-004-AC

Florida Department of Environmental Protection

Southwest District

Tampa, FL

October 7, 2005

Prepared by: Jose G. Zornitta

SECTION 1: PROJECT DESCRIPTION

A. Applicant / Authorized Representative:

Mr. William C. Ward, III, General Manager
Fero Funeral Home
SCI Funeral Services of Florida
7620 South U.S. Highway 41
Dunnellon, Florida 34432

B1. Application Contact:

Mr. Marco A. Delgado, Engineer
Matthews Cremation Division (formerly IEE Co.)
2045 Sprint Boulevard
Apopka, Florida 32703

B2. Application Prepared by:

Mr. Rama Iyer, P.E.
Southern Environmental Sciences, Inc.
1204 North Wheeler Street
Plant City, Florida 33563

C. Project Description and Location:

SIC Code: 7261 – Funeral Service and Crematories – Establishments primarily engaged in preparing the dead for burial, conducting funerals, and cremating the dead.

Fero Funeral Home – SCI Funeral Services of Florida
Site Name: Dunnellon Crematory
7620 South U.S. Highway
Dunnellon, Florida 34432

Project – will consist of an increase in minimum afterburner operating temperature range. The new range will be from (1600 °F to 1800 °F). Upon completion of the requirements of this (AC), the applicant will apply for a general permit utilizing the like unit test provided as part of this permit application. The Compliance section of the Department has reviewed and accepted the like unit test.

D. Process and Controls:

The existing emission unit is a Mathews IE43-PPII human cremation incinerator. The unit is designed to incinerate human remains and associated container material at an

average rate of 100 lbs/hr (the average rate is the total weight loaded into the unit divided by the duration of the burn). The incinerator consists of primary and secondary (afterburner) chambers each fired exclusively on natural gas with a maximum total heat input rate of 1.9 MMBtu/hr (1.2 MMBtu/hr primary chamber and 0.7 MMBtu/hr secondary chamber).

Emissions are controlled by the afterburner which maintains a minimum secondary chamber combustion zone temperature of 1,600 °F prior to and during combustion of material in the primary chamber. The secondary (afterburner) chamber volume provides at least a one (1) second residence time at a gas temperature of 1,800 °F. The secondary chamber temperature is continuously monitored and recorded.

E. Application Information:

Application Received on: 09/27/2005

Application Complete 10/07/2005

SECTION 2: RULE APPLICABILITY

This project is subject to the preconstruction review requirements of Chapter 403, Florida Statutes and Chapters 62-204 through 62-297, Florida Administrative Code (F.A.C.), as indicated below.

F.A.C. Section	Regulatory Provisions:	App.	Note
62-210.300	Sources Not Subject to Prevention of Significant Deterioration or Nonattainment Requirements	Yes	1
62-212.400	Prevention of Significant Deterioration	No	2
62-212.500	New Source Review for Nonattainment Areas	No	3
62-296.320(4)	General Particulate Emission Limiting Standards	Yes	4
62-296.320	General Pollutant Emission Limiting Standards	Yes	5
62-296.400	Stationary Source Emission Standards	Yes	6
62-296.500	Reasonably Available Control Technology (VOC)	No	7
62-296.700	Reasonably Available Control Technology (PM)	No	8
62-204.800	Standards of Performance for New Stationary Sources (NSPS)	No	9
62-204.800	Rule 62-204.800, National Emission Standard for Hazardous Air Pollutants, (NESHAPS)	No	10
62-213	Operation Permits for Major Sources of Air Pollution	No	11
62-297.310	General Compliance Test Requirements	Yes	12

1. The source(s) within this facility are not exempt from general permitting requirements
2. This facility is a PSD minor source
3. This facility is a PSD minor source
4. Not expected to be a significant source of unconfined particulate matter.
5. Facility is subject to the "no objectionable odor" limitation
6. Facility is subject to Rule 296.401(5) F.A.C. (human crematories)
7. Facility is not a covered source category and is located in an ozone attainment area
8. Facility is not a covered source category and is located in a particulate attainment area
9. Facility is not a covered source category
10. Facility is minor for HAPs
11. Facility is a minor non-Title V source
12. Compliance testing is required

SECTION 3: SUMMARY OF EMISSIONS

[Rule 62-296.401(5) F.A.C.]

- Visible Emissions shall not exceed 5% opacity
- Particulate emissions not to exceed 0.08 gr/dscf @ 7% O₂
- Carbon Monoxide emissions not to exceed 100 ppm @ 7% O₂

Testing shall be in accordance with EPA Methods 1, 2, 3, 4, 5 or 5A, 9 and 10.

Pollutant	Potential Emissions		Allowable Emissions		T.V. Limit	Note
	#/hr.	TPY	#/hr.	TPY	TPY	
CO	--	--	0.26	1.16	100	1
Particulates	--	--	0.42	1.82	100	2
SO ₂	0.16	0.71	--	--	100	3
NO _x	0.27	1.17	--	--	100	4
VOC	.014	0.06	--	--	100	5

1. Potential Emissions are equal to allowable emissions. Emissions based on 100 ppm @ 7% O₂ (See Rule above), flow data from testing of the same make and model Cremation unit, and 8,760 hours operation.
2. Potential Emissions are equal to allowable emissions. Emissions based on 0.08 gr/dscf @ 7% O₂ (See Rule above), flow data from testing of the same make and model Cremation unit, and 8,760 hours operation.
3. Potential Emissions based on AP-42 Section 2.3 (Medical Waste Incinerators) and 8,760 hours operation.
4. Same comment as (3) above.
5. Same comment as (3) above.

SECTION 4: CONCLUSIONS

The emission limits proposed by the applicant will meet all of the requirements of Chapter 62-296, F.A.C.

The general and Specific Conditions listed in the proposed permit (attached) will assure compliance with all the applicable requirements of Chapters 62-204 through 297, F.A.C.

SECTION 5: PROPOSED AGENCY ACTION

Pursuant to Section 403.087, Florida Statutes and Section 62-4.07, Florida Administrative Code, the Department hereby gives notice of its intent to issue a permit to construct the aforementioned air pollution source in accordance with the draft permit and its conditions as stipulated (see attached).
